

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

Case No.: 1:25-cv-20757-JB/Torres

JANE DOE,

Plaintiff,

v.

STEVEN K. BONNELL II,

Defendant.

**JOINT NOTICE OF RESOLUTION OF CONFIDENTIALITY DESIGNATION
AND MOTION TO REFILE PAPERS**

Plaintiff, Jane Doe (“Plaintiff”), and Defendant, Steven K. Bonnell II (“Defendant”), pursuant to that Protective Order Governing Discovery (“Protective Order”) [ECF 116] and Local Rule 5.4, hereby notify the Court as to the resolution of the dispute that arose between the parties regarding Plaintiff’s confidentiality designation of the entire deposition transcript of a non-party who was portrayed on certain online platforms as “Rose” (hereafter, “Non-Party”). *See* ECF Nos. 188 (Plaintiff’s Motion to Seal Certain Documents), 189 (Defendant’s Motion for Leave to File Certain Documents Under Seal), 195 (Defendant’s Motion for Leave to File Additional Documents Under Seal), and 198 (Defendant’s Opposition to Plaintiff’s Motion to Seal Certain Documents). Specifically, the parties continue to agree that Non-Party’s identifying information (i.e., legal name) is properly designated as “Confidential” pursuant to the Protective Order, and have subsequently agreed that certain, limited testimony from Non-Party’s deposition is “Confidential” pursuant to the Protective Order. The redacted version of Non-Party’s deposition transcript reflecting the parties’ resolution is attached as **Exhibit A**.

Accordingly, the parties seek leave to refile the following papers that relied on portions of Non-Party’s deposition transcript that are no longer designated as “Confidential”:

- Defendant's Motion for Sanctions Pursuant to Fed. R. Civ. P. 11, ECF No. 183;
- Plaintiff's Response in Opposition to Defendant's Motion for Sanctions Pursuant to Fed. R. Civ. P. 11, ECF No. 185;
- Plaintiff's Motion for Sanctions Pursuant to Fed. R. Civ. P. 11, ECF No. 186;
- Defendant's Reply to Plaintiff's Opposition to Motion for Sanctions Pursuant to Fed. R. Civ. P. 11, ECF No. 192;
- Defendant's Opposition to Plaintiff's Motion for Sanctions Pursuant to Fed. R. Civ. P. 11, ECF No. 197; and
- Defendant's Opposition to Plaintiff's Motion to Seal Certain Documents, ECF No. 198.

Upon the Court granting leave, the refiled versions of the aforementioned papers will rely on the version of Non-Party's deposition transcript attached as **Exhibit A**.

WHEREFORE, Plaintiff Jane Doe and Defendant Steven K. Bonnell II respectfully request that the Court enter an Order deeming Plaintiff's Motion to Seal Certain Documents [ECF 188], Defendant's Motion for Leave to File Certain Documents Under Seal [ECF No. 189], and Defendant's Motion for leave to File Additional Documents Under Seal [ECF No. 195] moot, and granting the parties leave to refile ECF Nos. 183, 185, 186, 192, 197, and 198, and granting such other and further relief as the Court deems just and proper.

Dated: January 7, 2026

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 7, 2026, a true and correct copy of the foregoing document was electronically filed with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Patricia M. Patino
Attorney